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VIA ELECTRONIC FILING

The Honorable Leonard P. Stark
U.S. District Court for the District of Delaware
J. Caleb Boggs Federal Building
844 N. King Street
Wilmington, DE 19801-3556

Re: *International Business Machines Corporation v. Groupon, Inc.*,
C.A. No. 16-122-LPS

Dear Chief Judge Stark:

Pursuant to the Court's Patent Procedures, the parties jointly request the scheduling of a teleconference to address IBM's Motion to Strike Groupon Inc.'s Late-Disclosed Invalidity Theories (D.I. 172 (motion); *see also* D.I. 173 (supporting letter), D.I. 176 (Defendant's response), D.I. 178 (IBM's reply)).

IBM respectfully requests a hearing at the Court's earliest convenience to determine whether it will be necessary to address Groupon's new invalidity references in advance of the November 3, 2017 deadline to file IBM's expert report on validity.

Respectfully,

/s/ Bindu A. Palapura

Bindu A. Palapura

BAP/sjh/5441948/43155

cc: Clerk of the Court (via hand delivery)
Counsel of Record (via electronic mail)